

Willard Marine Inc.
1250 N. Grove St.
Anaheim, CA 92806
ID: 62617

EQUIPMENT DESCRIPTION

A/N 477538 (Current p/n F60862, a/n 412977)

SPRAY ROOM, RESIN SPRAY OPERATION, DRY FILTER TYPE, 102'-0" W. X 104'-0" L. X 18'-0" H., WITH TWO EXHAUST PLENUMS, (1) WITH A 10 HP EXHAUST FAN AND THIRTY 20" X 20" X 2" FILTERS, AND (2) WITH A 7.5 HP EXHAUST FAN AND FIFTEEN 20" X 20" X 2" FILTERS.

A/N 477540

Title V Facility Permit Amendment

BACKGROUND

Willard Marine submitted a/n 477538 to change a condition on an existing permit (p/n F60862) for a spray room. Originally, Willard Marine wanted to alter condition no. 5 of this permit by requiring the use of acetone instead of water emulsive cleaners to use for cleaning in the spray room. But after careful review, it was decided to remove this condition altogether since acetone is used for cleaning purposes. Acetone is a Rule 102 exempt compound and is thus not regulated. It is also not a Rule 1401 toxic air contaminant. Willard Marine is required to use cleaning solvents that comply with Rule 1171, as specified in the "*Emissions And Requirements*" section of this permit and by using acetone will comply with this requirement. Removal of condition no. 5 is the only change processed with this application.

Willard Marine is a Title V facility. A Title V renewal permit was issued to this facility on January 13, 2008. Willard Marine has proposed to revise their Title V renewal permit by removing a condition on a spray room permit (application no. 477538). The permit revision is considered as a "minor permit revision" to the Title V renewal permit, as described in Regulation XXX evaluation.

PROCESS DESCRIPTION

Willard Marine is in the business of manufacturing of light-weight boats for the Navy and Coast Guard. The facility operates a paint spray room and other supporting equipment. They operate 8 hr/day, 5 day/wk and 52 wk/yr.

EMISSION ESTIMATES

VOC and PM10 emissions remain unchanged from the original application.

Hourly VOC emissions = 6.4 lb/hr

Daily VOC emissions 51.2 lb/day (8 hr/day)

Uncontrolled hourly PM10 emissions = 5.7 lb/hr

Uncontrolled daily PM10 emissions = 45.6 lb/day

Controlled hourly PM10 emissions = 0.57 lb/hr

Maximum Controlled daily PM10 emissions = 4.6 lb/day

RULE ANALYSIS

RULE 212: Public notification is not necessary since this is not a significant project. The use of acetone for cleaning purposes will not result in an emission increase from the equipment or the facility. Further, acetone is not a Rule 1401 contaminant.

RULE 401: Visible emissions are not expected with the proper operation of this equipment.

RULE 402: Operation of this equipment is not expected to create a nuisance.

RULES 1162 & 1171: Willard Marine is operating in compliance with these rules, as determined through their last inspection on September 20, 2007.

Reg XIII: The applicant is proposing to use acetone for cleaning purposes and since acetone is an exempt compound, there is no emission increase associated with the proposed change of permit condition. Therefore, the requirements of Reg XIII are not applicable.

RULE 1401: Not applicable, since acetone is the only emission increase associated with the proposed change of condition and acetone is not a Rule 1401 contaminant.

REGULATION XXX

This facility is not in the RECLAIM program. The proposed project is considered as a “minor permit revision” to the Title V permit for this facility.

Rule 3000(b)(12)(vi) defines a “minor permit revision” as any Title V permit revision that does not result in an increase in emissions of a pollutant subject to Regulation XIII – New Source Review (non-RECLAIM pollutants) or a hazardous air pollutant (HAP).

The proposed project is not expected to result in an increase in emissions of a pollutant subject to Regulation XIII – New Source Review (non-RECLAIM pollutants) or a hazardous air pollutant (HAP), and therefore is considered as a “minor permit revision” pursuant to Rule 3000(b)(12)(A)(vi).

This proposed project is the 1st permit revision to the Title V renewal permit issued to this facility on January 13, 2008. The following table summarizes the permit revisions since the Title V renewal permit:

Revision	HAP	VOC	NO_x	PM₁₀	SO_x	CO
1 st Permit Revision; removal of condition	0	0	0	0	0	0
Cumulative Total	0	0	0	0	0	0
Maximum Daily	30	30	40	30	60	220

RECOMMENDATION

The proposed project is expected to comply with all applicable District Rules and Regulations. Since the proposed project is considered as a “minor permit revision”, it is exempt from the public participation requirements under Rule 3006(b). A proposed permit incorporating this permit revision will be submitted to EPA for a 45-day review pursuant to Rule 3003(j). If EPA does not have any objections within the review period, a revised Title V permit will be issued to this facility.